

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

RIVKA MANDEL,

Plaintiff,

v.

JACOB DASKAL, BELLA DASKAL, PEARL DEMBITZER, LEIBY DEMBITZER, CHAYA BORNSTEIN, SHULEM BORNSTEIN, CHAIM DASKAL, ESTHER BRODY, ROSE TEITELBAUM, BENZION DASKAL, SOLOMON DASKAL, BARRY DASKAL, CHAVI FISCHBEIN, ISAAC FISCHBEIN, BORO PARK SHOMRIM, BAIS YAAKOV HIGH SCHOOL OF CHICAGO, CRAINDELL Z. MANNES, RABBI BEN ZION HALBERSTAM, CHAIM S. HALBERSTAM, CONGREGATION SHAAREI ZION OF BOBOV, RABBINICAL COLLEGE BOBOVER YESHIVA BNEI ZION, LIPA "NUSSY" BRAUNER, MUTTY BRAUNER, YAD EPHRAIM a/k/a EZRAS CHOLIM YAD EPHRAIM, PESACH GREENBERG, YACHAD D'BOBOV, and CHAIM FLEISCHER,

Case No. 1:23-cv-07352 (RER) (VMS)

Defendants.

**DEFENDANTS RABBI BEN ZION HALBERSTAM AND CHAIM S. HALBERSTAM'S
NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT UNDER
FEDERAL RULE OF CIVIL PROCEDURE 12(B)(6)**

PLEASE TAKE NOTICE that, pursuant to the briefing schedule entered by the Court in this matter on April 4, 2024, and upon the accompanying Memorandum of Law, the undersigned hereby move this Court on behalf of Defendants Rabbi Ben Zion Halberstam and Chaim S. Halberstam for an order dismissing Plaintiff's Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: New York, New York
May 24, 2024

Respectfully submitted,

By: /s/ Andrew J. Levander

Andrew J. Levander
Gary J. Mennitt
May Chiang
Julia Markham-Cameron*
Dechert LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Telephone: 212-698-3500
Email: andrew.levander@dechert.com
Email: gary.mennitt@dechert.com
Email: may.chiang@dechert.com
Email: julia.markham-
cameron@dechert.com

*Attorneys for Defendants Rabbi Ben
Zion Halberstam and Chaim S.
Halberstam*

* admitted pro hac vice